U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Treoil Industries Biorefinery - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #2**
Site assessment progress
Treoil Industries Biorefinery

Ferndale, WA
Latitude: 48.8789186 Longitude: -122.7107528

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From: Brooks Stanfield, On Scene Coordinator
Date: 3/18/2017
Reporting Period: End of Week 1

1. Introduction

1.1 Background

Site Number:	10PZ	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	OPA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	3/13/2017	**Start Date:**	3/13/2017
Demob Date:		**Completion Date:**	
CERCLIS ID:	WAN 001002088	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:	E17004	**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency response. CERCLA and OPA concerns.

1.1.2 Site Description

Treoil Industries is an approximately 34-acre industrial property. The site is currently reported as not in operation however historically has been used for tall oil processing, as a biodiesel refinery, metal fabrications, and other small scale miscellaneous industrial operations.

1.1.2.1 Location

4242 Aldergrove Road - Ferndale (Whatcom County), Washington

The site is approximately 1.8 miles from the shoreline of the Strait of Georgia, a navigable water of the United States.

1.1.2.2 Description of Threat

3/6/17
EPA received initial reports from a site visit conducted by Washington Department of Ecology and Whatcom County Health Department, which outlined a deterioration of safety and environmental conditions on the property including but not limited to: hazardous substances that had released from containers or threatened to release, improper storage and labeling of chemical containers, oil being stored within failing secondary containment or no containment at all, and a complete lack of site security.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Following a week of site investigation activities EPA confirmed:

- Approximately 42 visible Aboveground Storage Tanks (ASTs) and totes containing upwards of approximately 100,000 gallons of abandoned tall oil and potentially other biological oils. Initial assessment results indicated that tall oil in ASTs is in a combination of liquid and solid phases.
- An estimated 8,000 gallons of glycerin crude from biodiesel production;
- Over 440 containers of hazardous chemicals in leaking, mislabeled, or otherwise inappropriately stored containers that fall under six of nine DOT hazard classes;
- Asbestos containing material in deteriorated condition discarded onto soil, warehouse floors, left in five 1-cubic-yard sacks and other open containers.
- An open drum full of large granules that were measured to consist of 200,000 ppm (20%) lead and 15,000 ppm arsenic.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Refer to PolRep #1.

2.1.2 Response Actions to Date

3/14/17

Initial Removal Site Evaluation, site preparation, initial stabilization of chemicals posing threat of release, FirstStep categorization of unknown chemicals.

3/18/17

Stabilization, sampling, and hazard categorization of over 440 totes, drums, and miscellaneous containers of hazardous chemicals found to be leaking, mislabeled, and/or improperly stored.

Asbestos sampling and containment of approximately 6 cubic-yards of materials that tested positive as ACM in preparation for off-site disposal.

Collaboration with PRP and the Washington Department of Ecology to arrange for the shipment of 7 totes containing approximately 1,500 gallons of commercially viable glycerin crude for off-site recycling.

Consolidation of over 2,500 gallons of tall oil from leaking totes into containers ready for off-site shipment and disposal.

Solidification of approximately 18 yards of tall oil sludge in preparation for off-site disposal.

Assessment of ASTs to determine access strategies, contents, and volumes in effort to better determine their threat of discharge and possible removal or containment options.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Refer to PolRep #1.

2.1.4 Progress Metrics

Containers inventoried 430
FirstStep samples collected 220
FirstStep Analyses 280

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Recycling*	*Disposal*
Glycerin crude	Liquid	1,500 gal		X	
Tall oil	Liquid	2,500 gal			
Tall oil sludge	Solid	18 cy			

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Continued transloading of glycerin crude for off-site recycling. Anticipate completion of this task in the coming week.

Finalizing inventory, sampling, and hazard categorization of the few remaining (hard to access) abandoned containers from Warehouse B and those left partially submerged in the large secondary containment area.

Inventory of contents of shipping container along west fence line behind Warehouse B.

Continued assessment of ASTs to determine contents, volumes, and tactics for recovery of liquids that pose a threat of discharge. Anticipate completion of this task on Monday 3/20/17.

2.2.1.2 Next Steps

Continued coordination with State and PRP on conducting on-site response activities and working to safely recycle hazardous materials recovered from abandoned tanks on site.

Identification of laboratory analytical needs to be arrange for the disposal and/or recycling of tall oil in addition to waste water found in ASTs and secondary containment.

Sampling of contaminated sediments in trenches and sumps from Warehouses A and B should be completed Monday 3/20/17.

Coordination with Ecology on sampling plans for stained sediment and soil.

A visit has tentatively been scheduled for Monday 3/20/17 with representatives of the Lummi Nation natural resources department to observe site operations and discuss future activities on the site.

2.2.2 Issues

Site personal have worked six consecutive 12-hour days and will be taking Sunday off for health and safety reasons. A private security officer will be on site during this time.

Weather conditions (cold temperatures and heavy rainfall) continue to be a challenge for response personnel. Heavy rain and high water tables have made effective and safe operation of heavy equipment, especially the Genie lift, challenging in some areas of the site.

As mentioned, a limited number of totes and drums have not yet been accessed or sampled due to access challenges.

Because most of the ASTs are large and difficult to access, the process of assessing their contents requires a Genie manlift, which adds to the complexity and time needed to accomplish this task.

The use of two sources of funding (CERCLA and OPA) added complexity initially in managing contracts and cost tracking.

2.3 Logistics Section

An ongoing challenge throughout this response has been securing hotel accommodations nearby for all response personnel.

2.4 Finance Section

2.4.1 Narrative

As of 3/18/17:
CERCLA cost ceiling is $255,300.
OPA cost ceiling is $350,000

These are subject to change as more of the unknown conditions are assessed to a greater degree.

2.5 Other Command Staff

2.5.1 Safety Officer

Valeriy Bizyayev - START

2.5.2 Liaison Officer

TBD

2.5.3 Information Officer

Bill Dunbar - EPA

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Washington Department of Ecology
Whatcom County Health Department
US Department of Interior
National Oceanic and Atmospheric Administration
US Coast Guard - National Pollution Funds Center

3.3. Cooperating tribes

Lummi Nation

4. Personnel On Site

Since PolRep #1 on 3/15/17....

EPA OSCs - 2
EPA ERRS Contractors - 8
EPA START Contractors - 5

Property Owner Representative, Atul Deshmane - Whole Energy

Washington Department of Ecology Hazardous Waste Program - 1

5. Definition of Terms

Tall oil - also called "liquid rosin" or tallol, is a viscous yellow-black odorous liquid obtained as a by-product of the Kraft process of wood pulp manufacture when pulping mainly coniferous trees. It is treated as an oil under the federal Oil Pollution Act.

CERCLA - Comprehensive Environmental Response Compensation and Liability Act

OPA - Oil Pollution Act

Ecology - Washington Department of Ecology

FirstStep- FirstStep method of hazard class categorization of unknown chemicals for purposes of identification, storage, transportation, and disposal.

PPE - Personal Protective Equipment

ACM - Asbestos Containing Material

AST - Aboveground Storage Tank

6. Additional sources of information

6.1 Internet location of additional information/report

EPA Emergency Response incident webpage for Treoil:
response.epa.gov/treoil

Washington Department of Ecology Toxic Cleanup Program webpage for Treoil:
https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=950

6.2 Reporting Schedule

The next PolRep is anticipated by Wednesday 3/22/17.

7. Situational Reference Materials

Maps and site diagrams forthcoming in future reports.